

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

Sub-Committee of Experts on the Transport of Dangerous Goods

21 November 2017

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Item 3 of the provisional agenda

Listing, classification and packing

What constitutes a SAFETY DEVICE, UN3268?

Transmitted by the Council on the Safe Transportation of Hazardous Articles (COSTHA)

1. At its forty-first session, the Sub-Committee revised the proper shipping name of UN3268 from “AIR BAG INFLATORS, AIR BAG MODULES or SEAT-BELT PRETENSIONERS” to “SAFETY DEVICES” with descriptive text reading “*electrically ignited*”.
2. Special Provision 280 states: “This entry applies to safety devices for vehicles, vessels or aircraft, e.g. air bag inflators, air bag modules, seat-belt pretensioners, and pyromechanical devices, which contain dangerous goods of Class 1 or of other classes, when transported as components parts and if these articles as presented for transport have been tested in accordance with Test Series 6(c) of Part 1 of the Manual of Tests and Criteria, with no explosion of the device, no fragmentation of device casing or pressure receptacle, and no projection hazard nor thermal effect which would significantly hinder fire-fighting or emergency response efforts in the immediate vicinity ...”.
3. It stands to reason if the product meets the criteria of Special Provision 280 then the product should be eligible for identification as a Safety device. One such product is a Micro gas-generator. A micro gas-generator fulfills the same function for a seat-belt pretensioner as an inflator does for an airbag module.

Proposal

4. COSTHA requests the Explosives Working Group discuss what may be considered a SAFETY DEVICE for the purpose of understanding the position of different Competent Authorities regarding this issue.
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